

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CASE NO.**

JAMES N. ZIEBELL,
Plaintiff,

Judge
Magistrate Judge

vs.

AMERICAN EXPRESS NATIONAL
BANK, f/k/a AMERICAN EXPRESS
BANK, FSB; EXPERIAN INFORMATION
SOLUTIONS, INC.; EQUIFAX
INFORMATION SERVICES, LLC; and
TRANS UNION, LLC,
Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff James Ziebell served Trans Union on or about June 28, 2018 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto as **Exhibit C** is a copy of Trans Union, LLC's Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 79-83.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

6. As of the date of this Notice of Removal, Equifax Information Services, LLC (“Equifax”) and Experian Information Solutions, Inc. (“Experian”) have been served. Counsel for Trans Union has contacted counsel for Equifax and counsel for Experian, and they have consented to this removal as evidenced by the consents attached hereto as **Exhibit D** and **Exhibit E**. Trans Union has been advised by the Clerk for the 4th Judicial District Court of Hennepin County, Minnesota that there is no record of service for Defendant American Express National Bank, f/k/a American Express Bank, FSB.

7. Notice of this removal will promptly be filed with the 4th Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

FISHER BREN & SHERIDAN, LLP

Dated: 7/18/2018

By: s/ Bradley D. Fisher

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